

**MEMO ENDORSED**

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 Corporation Counsel

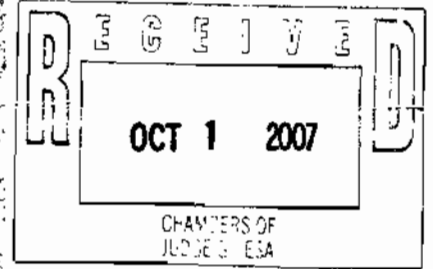
THE CITY OF NEW YORK  
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September 28, 2007

**BY HAND**

Honorable Thomas P. Greisa  
 United States District Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007



Re: Calvin Jones v. City of New York 07 CV 3850 (TPG)

Your Honor:

I am the Assistant Corporation Counsel assigned to the defense for defendant City of New York and Raymond Kelly<sup>1</sup> with respect to the above-referenced matter, in which plaintiff alleges that he was subjected to excessive force by the defendants.

While we do not yet represent him, we write on behalf of defendant Oscar Paredes, to request a brief one month extension, until October 26 2007 for him to answer or otherwise move. I attempted to contact plaintiff's counsel for his consent, but have not yet heard back from him. This extension will provide time for this office to make a representational decision with respect to defendant Paredes. *See Mercurio v. The City of New York et al.*, 758 F.2d 862, 864-65 (2d Cir. 1985) (quoting *Williams v. City of New York et al.*, 64 N.Y.2d 800, 486 N.Y.S.2d 918 (1985) (decision whether to represent individual defendants is made by the Corporation Counsel as set forth in state law)).

No previous request for an extension has been made by defendant Paredes. Accordingly, we respectfully request that defendant Paredes's time to respond to the complaint be extended until October 26, 2007.

Thank you for your consideration herein.

Respectfully submitted,

*Lisa Rabinowitz*  
 Lisa Rabinowitz (LR 7946)

cc: Leo Glickman, Esq. (by fax)

<sup>1</sup> The City and Commissioner Kelly filed their answer today.

*Approved*  
*Thomas P. Greisa*  
*USJD* 10/1/07